

STATE OF INDIANA)
COUNTY OF PORTER)
LINDA REGNIER,)
Plaintiff,)
v.)
HEALTHLINC, INC., KIMBERLY)
HESS, M.D., STACIE BRASWELL,)
M.D. and ANONYMOUS HEALTH)
CENTER,)
Defendants.)

FILED
IN OPEN COURT
DEC 4 2014
TRIAL RULE 5(E)
IN THE PORTER CIRCUIT/SUPERIOR COURT
SITTING IN _____, INDIANA
Cause No.: 64001-1412-CT-10593

COMPLAINT FOR DAMAGES AND JURY DEMAND

Comes now Plaintiff, Linda Regnier, by her counsel, Ronald F. Layer of Layer, Tanzillo, Stassin & Babcock, P.C., and for her cause of action against Defendants, Healthlinc, Inc, Kimberly Hess, M.D. Stacie Braswell, M.D. and Anonymous Health Center, and each of them, states as follows:

1. That at all times mentioned herein the Defendant, Healthlinc, Inc. (Healthlinc), was a medical corporation doing business in the State of Indiana and was a healthcare provider as defined by Indiana Law, engaged in providing health care in Porter County Indiana.

2. That at all times mentioned herein the Defendants, Kimberly Hess, M.D. and Stacie Braswell, M.D. were health care providers as defined by Indiana Law, engaged in providing health care services in Porter County, Indiana.

3. That at all times mentioned herein the Defendant, Anonymous Health Center, was a medical corporation doing business in the State of Indiana and was a healthcare provider as defined by Indiana Law, engaged in providing health care in Porter County Indiana.

4. That the Defendant Healthline, began treating the Plaintiff for various health issues including female/gynecological problems in August 2011.

5. That endometrial biopsies were done on the Plaintiff at the Defendant, Healthline in October or November 2011.

6. That Plaintiff continued to treat with Healthline through and including 2013.

7. That the Plaintiff began treating with Anonymous Health Center in 2012.

8. That the Plaintiff had an endovaginal ultrasound done at Anonymous Health Center on December 11, 2012 and a follow-up appointment for the results of same on December 17, 2012.

9. That no other tests were scheduled or were performed.

10. That there was no follow-up with the Defendant Anonymous Health Center or Healthline to schedule additional testing.

11. That the Plaintiff thinking she was not having any serious health issues continued with her life occasionally visiting Healthline through and including 2014.

12. That a pelvic ultrasound was done on January 16, 2014, by Defendant, Healthline, which noted possibility of an endometrial polyp or endometrial carcinoma.

13. That the Plaintiff went to another doctor and it was determined that she had endometrial carcinoma with one positive lymph node and her cancer was at stage III.

14. That the Defendants, and each of them, fell below the standard of care in failing to provide sufficient information to the Plaintiff to seek other medical assistance of a specialist, failed to provide sufficient information to the Plaintiff regarding the necessity of additional testing and failed to order or schedule additional testing which Plaintiff believes was the standard of care at the time.

15. That the Defendants were negligent and fell below the standard of care to include but

- a. negligent follow-up.
- b. negligent testing.
- c. failed to do standard of care testing.
- d. failed to refer her to a specialist.
- e. failed to inform her of the likelihood of cancer.
- f. improperly read the testing that was done.
- g. were otherwise negligent.

16. That the Plaintiff claims there existed a continuous wrong based on the acts and/or failures to act on the part of the Defendants, and each of them.

WHEREFORE, Plaintiff, Linda Regnier, prays for damages against the Defendants, Healthlinc, Inc, Kimberly Hess, M.D., Stacie Braswell, M.D. and Anonymous Health Center and each of them, in an amount that is reasonable in the premises, for the costs of this action, and for all further just and proper relief in the premises:

LAYER, TANZILLO, STASSIN & BABCOCK, P.C.
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PLAINTIFF DEMANDS TRIAL BY JURY

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Group Exhibit 1